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Where ideas connect

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June 17, 2003

Mary Ann Wright, Associate Director of Mining
Division of Oil Gas & Mining
1594 West North Temple
Suite 1210
P.O. Box 145801
Salt Lake City, Utah 84114-5801

Dear Ms. Wright:


Subject: Comments on Draft Inspection and Enforcement Rules for Minerals – 4/29/03

We thank you for the opportunity to comment on your proposed rules. It is our hope that these comments will be timely and helpful. If you have any questions please contact Mike Herkimer of my staff at 538-6058. Our comments are listed below:

1. There are a number of time frames given for review of documents. This requires that dates of receipt should be well documented by both parties. Our concern is not with large industries, but with smaller companies, who may not understand or be confused about the importance of documenting dates or times. What if those dates and times are missed by your staff or by the Company (page 13, R647-7-106)?
2. There is no mention of mitigation projects.
3. On page 10 part 2.16, should you get more specific and mention some types of information (not all inclusive) that would be acceptable to document an economic hardship?

If we can be of further assistance please let us know.

Sincerely,


Don A. Ostler, P.E.
Director

DAO:MDH:mc

CC: Wayne Hedberg, Division of Oil, Gas & Mining

cc *Susan W.*
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